

REMARKS

Reconsideration of the present application is respectfully requested in view of the following remarks. Prior to entry of this response, Claims 1-10 were pending in the application, of which Claim 1 is independent. In the Office Action dated March 8, 2006, Claims 1-10 were rejected under 35 U.S.C. § 103(a). Following this response, Claims 1-11 remain in this application, new independent Claim 11 being added by this Amendment. Applicants hereby address the Examiner's rejections in turn.

I. Rejection of the Claims Under 35 U.S.C. § 103(a)

In the Office Action dated March 8, 2006, the Examiner rejected Claims 1-10 under 35 U.S.C. § 103(a) as being unpatentable over U.S. Published Patent Application No. 2001/0018697 ("*Kunitake*"). Claim 1 has been amended, and Applicants respectfully submit that the amendment overcomes this rejection and adds no new matter.

Amended Claim 1 is patentably distinguishable over the cited art for at least the reason that it recites, for example, "wherein merging the matching and difference blocks so that all markup language tags contained in the merged document are well formed further comprises well formed comprising the matching and the difference blocks merged in an order such that no overlapping tags are present in the merged document." Support for this amendment can be found in the specification at least on page 12, lines 5 through 27.

In contrast, *Kunitake* at least does not teach or suggest the aforementioned recitation. For example, the Examiner stated that *Kunitake* does not expressly state that the merged document language tags are well-formed. In an attempt to overcome this deficiency, however, the Examiner states that it is “well-known” that a “well-formed” document allows a markup language file to be read by all Web browsers in view of *Microsoft Computer Dictionary*, page 565. (See Office Action, page 3, lines 3-11.) Applicants respectfully submit that while the *Microsoft Computer Dictionary* provides one definition of “well-formed”, it does not teach suggest or disclose “well formed comprising the matching and the difference blocks merged in an order such that no overlapping tags are present in the merged document.” Rather, the *Microsoft Computer Dictionary* merely states that a “well-formed” document allows a markup language file to be read by all Web browsers. Consequently, like *Kunitake*, the *Microsoft Computer Dictionary* does not disclose or suggest “well-formed” as meaning the matching and the difference blocks merged in an order such that no overlapping tags are present in a merged document.

In short, *Kunitake* by itself or in combination with the *Microsoft Computer Dictionary* would not have led to the claimed invention because *Kunitake* and/or the *Microsoft Computer Dictionary*, either individually or in combination, at least do not disclose or suggest “wherein merging the matching and difference blocks so that all markup language tags contained in the merged document are well formed further comprises well formed comprising the matching and the difference blocks merged in an order such that no overlapping tags are present in the merged document,” as recited by amended Claim 1. Accordingly, independent Claim 1 patentably distinguishes the

present invention over the cited art, and Applicants respectfully request withdrawal of this rejection of Claim 1.

Dependent Claims 2-10 are also allowable at least for the reasons described above regarding independent Claim 1, and by virtue of their dependency upon independent Claim 1. Accordingly, Applicants respectfully request withdrawal of this rejection of dependent Claims 2-10.

II. New Claim

Claim 11 has been added to more distinctly define and to round out the protection for the invention to which Applicants are entitled. Applicants respectfully submit that the claim is allowable over the cited art and that it adds no new matter.

III. Conclusion

In view of the foregoing remarks, Applicants respectfully request the reconsideration and reexamination of this application and the timely allowance of the pending claims. The preceding arguments are based only on the arguments in the Office Action, and therefore do not address patentable aspects of the invention that were not addressed by the Examiner in the Office Action. The claims may include other elements that are not shown, taught, or suggested by the cited art. Accordingly, the preceding argument in favor of patentability is advanced without prejudice to other bases of patentability. Furthermore, the Office Action contains a number of statements reflecting characterizations of the related art and the claims. Regardless of whether any

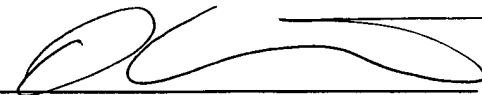
such statement is identified herein, Applicants decline to automatically subscribe to any statement or characterization in the Office Action.

Please grant any extensions of time required to enter this response and charge any additional required fees to our deposit account 13-2725.

Respectfully submitted,

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